

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA *ex rel.*
ELLSWORTH ASSOCIATES, LLP,

Plaintiff-Relator,

v.

CVS HEALTH CORPORATION, *et al.*,

Defendants.

Case No.: 2:19-cv-02553-JMY

**DEFENDANTS' MOTION TO AMEND THE COURT'S
ORDER UNSEALING THE SECOND AMENDED COMPLAINT**

Defendants CVS Health Corporation, SilverScript Insurance Company, LLC, CVS Caremark Corporation, and CVS Pharmacy, Inc. respectfully request that the Court amend its order of May 6, 2022 (ECF. No.21) to state expressly that: Relator shall serve an unredacted copy of the Second Amended Complaint on Defendants within 48 hours; Relator shall maintain redactions to the Second Amended Complaint only to protect the privacy of enrollees in Medicare Part D prescription drug plans offered by SilverScript; and such redactions shall apply only to the copy of the Second Amended Complaint that appears on the docket.

The reasons for the requested relief are set forth in the accompanying Memorandum of Law, which is incorporated by reference as if fully set forth herein.

Dated: October 6, 2022

/s/ Lesli C. Esposito

Brian R. Stimson (*pro hac vice*)
Jennifer B. Routh (*pro hac vice*)
Lesli C. Esposito (PA Bar No. 201906)
Theodore E. Alexander (*pro hac vice*)
Crystal Fomba (*pro hac vice*)
MCDERMOTT WILL & EMERY LLP
500 North Capitol Street NW
Washington, DC 20001
(202) 756-8000

Counsel for Defendants
CVS Health Corporation; CVS Pharmacy, Inc.;
SilverScript Insurance Company, LLC; and
CVS Caremark Corporation